

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION

RJ TECHNOLOGY LLC,

Plaintiff,

v.

SAMSUNG ELECTRONICS CO., LTD. and  
SAMSUNG ELECTRONICS AMERICA,  
INC.

Defendants.

**Civil Action No. 2:22-cv-401**

**JURY TRIAL DEMANDED**

**UNOPPOSED MOTION TO CHANGE LEAD COUNSEL DESIGNATION**

Plaintiff RJ Technology LLC (“Plaintiff”) hereby requests that the Court change the designation of lead attorney for Plaintiff in the above-styled action. Plaintiff’s proposed new lead attorney, Mr. Daniel Zaheer, is a partner at Plaintiff’s lead firm, Kobre & Kim, and has played a significant role in managing this case from the beginning, along with Mr. Michael Ng, Plaintiff’s designated lead attorney. Mr. Ng has recently reduced his involvement in this case due to commitments that have arisen on other matters, which are likely to continue. In light of Mr. Zaheer’s involvement and expected continued management of the case, and Mr. Ng’s expected reduced involvement, Plaintiff requests its lead counsel designation be changed from Mr. Michael Ng to Mr. Daniel Zaheer. Because of his involvement and shared case management to date, Mr. Zaheer has full knowledge of the case and authority to argue and negotiate on Plaintiff’s behalf in accordance with the requirements in the Court’s Standing Order Regarding “Meet and Confer” Obligations Relating to Discovery Disputes and as required by Local Rule CV-11(a).

Defendants Samsung Electronics Co., LTD and Samsung Electronics America, Inc. do not oppose Plaintiff's requested relief.

Dated: November 6, 2023

Respectfully submitted,

/s/ Michael Ng by permission Andrea L. Fair

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**CERTIFICATE OF SERVICE**

I hereby certify that counsel of record who are deemed to have consented to electronic service are being served this November 6, 2023, with a copy of this document via the Court's CM/ECF System per Local Rule CV-5(a)(3).

/s/ Andrea L. Fair

Andrea L. Fair

**CERTIFICATE OF CONFERENCE**

The undersigned hereby certifies pursuant to Local Rule CV-7(h) that the relief requested in this motion is unopposed.

/s/ Andrea L. Fair

Andrea L. Fair